

FILED

ABRAHAM JOHN PUSA
2955 MONTROSE AVENUE
LA CRESCENTA, CA. 91214
(818)441-8881

Plaintiff in Pro per

2013 JUN 26 PM 4:16

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY: 

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ABRAHAM JOHN PUSA
2955 MONTROSE AVENUE
LA CRESCENTA, CA. 91214
(818)441-8881

Plaintiff,

VS.

Federal Bureau of Investigation, LA
United States Attorney, Los Angeles
Los Angeles County Sheriff CV Station)
Glendale Police Department
One To Ten, All Inclusive

Defendants.

CV13-04658-BRO(PLA_x)

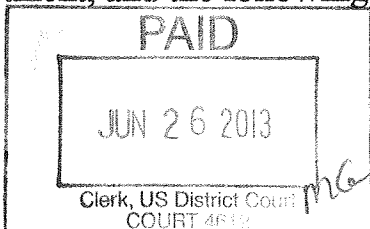
CIVIL ACTION NO _____

COMPLAIN FOR INJUNCTIVE RELIEF:

FALSE CLAIM ACT

COMPLAINT FOR INJUNCTIVE RELIEF

1. This is an action under Freedom of Information Act, Title 5 U.S.C §552, and Title 5, §552(a)(4)(B) to order the production of all written, verbal, electronic surveillance records or any other communications and documents pertaining to plaintiff, between Federal Bureau of Investigation, United States Attorney Office, Los Angeles County Sheriff C.V. Station, Glendale Police Department, and the following individuals, persons, or entities;



COMPLAINT

1 John Adem 4915 Alta Canyada Road, La Canada, CA. 91011,
2 Ergun Goral 2955 Montrose Ave. La Crescenta, CA. 91214,
3 Edward Adam 2502 Upper Terrace, La Crescenta, CA. 91214,
4 Robert Adem 317 W. 6th St. Los Angeles, CA. 90014,
5 Fehmi Tasci 3104 Santa Carlotta, La Crescenta, CA. 91214
6 Greg Lucett 330 N. Brand Blvd. Glendale, CA 91203, and all other
7 persons or entities reference to the plaintiff that defendants improperly holding.

8 I. JURISDICTION

9 The United States District Court for the Central District of California has
10 subject matter jurisdiction over this matter pursuant to Title 28 U.S.C. Section
11 1331; False Claim Act Title 18 U.S.C. Section 1001, and False Claim Act Title 31
12 U.S.C Section 3729 et seq This Court has pendent jurisdiction over the state claim

13 II. VENUE

14 Venue lies in this district pursuant to Title 28 U.S.C. Section 1391; and
15 False Claim Act Title 31 U.S.C. Section 3729 et seq. Defendants commit crimes
16 against the plaintiff, and gave false statements to United States government for
17 financial compensation.

18 III. PARTIES

19 1. Plaintiff, Abraham John Pusa is a private citizen and resident of this
20 district.

21 2. Defendant, Federal Bureau of Investigation a United States
22 government agency

23 3. Defendant, United States Attorney Office a department within United
24 States government.

25 4. Defendant, Los Angeles County Sheriff CV Station a department
26 within County of Los Angeles, in State of California.

27 5. Defendant, Glendale Police Department within City of Glendale, in
28 the State of California.

COMPLAINT

1 IV. THE REASON THE PLAINTIFF REQUESTING THE DOCUMENTS

2 1. Plaintiff, Abraham John Pusa, is a private citizen, and he is the
3 requestor of the records which the defendants are now holding. Plaintiff is
4 requesting those documents to find exact nature of all false allegations against him
5 by the defendants to clear his damaged name.

6 2. Defendants, Federal Bureau of Investigation, United States Attorney
7 Office, Los Angeles County Sheriff CV Station and Glendale Police Department
8 (GPD) have the documents the plaintiff seeks.

9 3. Plaintiff has the right to access to the requested documents or
10 information under Title 5 U.S.C Section 552 (a) (3), and there is no legal basis for
11 defendants' denial of such access. Defendants wasted taxpayers' funds and violated
12 False Claim Act 18 U.S.C. section 1001, and FCA Title 31 U.S.C. Section 3729.
13 Since 1990 to present time, defendants knowingly and intentionally based on false
14 statement and premises asked the court to conduct fraudulent surveillance operation
15 apply physiological warfare, created fear mongering, engage in a conspiracy and
16 bias campaign, police and prosecution misconduct, profiled and black listed the
17 plaintiff, created hostility, striped his legal right, tampered with his citizenship
18 statues, misstated plaintiff's activities and character, emotionally depressed caused
19 health problems, flied and circulated helicopter over plaintiff's house intentionally
20 to agitate neighbors, to cause hostility against the plaintiff, and many other police
21 and prosecution gross misconducts.

22 4. Defendants stage and commit crimes, then falsely accuse the plaintiff
23 with the same crimes, they placed rewards to anyone would hurt, and falsely accuse
24 the plaintiff with negative allegations to harm, harass, and create hostility against
25 him. Overzealous defendants desperately want to connect the plaintiff with crimes
26 and portray him mastermind of all tragedies, retaliating against him for exposing
27 criminals' crimes, then laugh about it. Bribed defendants rubber stamp criminals'
28 statements always true, while plaintiff's statements are crazy false.

COMPLAINT

1 5. Defendants and criminals meet, and decide which lies to spread that
2 would cause the most damage to the plaintiff. Liar defendants falsely classified
3 the plaintiff: enemy of the state, Muslim terrorist named Mohammed, spy, radical
4 anti-government, mastermind of tragedies, killer, extortionist, dangerous criminal,
5 drug addict, rapist, trouble maker, stalker, asked people falsely accuse the plaintiff
6 with criminal acts and many other vicious false statements to demonize, neutralize
7 dehumanize, to force the plaintiff move to other States for exposing criminals' crimes.
8 Defendants and criminals instructed individuals to place medical drugs in plaintiff's
9 food and drinks to cause health problems and prevent him function in society, then
10 laugh about it. On August 20, 2012, plaintiff's complained to the defendant
11 United States Attorney office about criminal activities, and on August 24, 2012,
12 defendant denied plaintiff's request for further investigation and production of
13 documents. Copy of denial letter is Exhibit-A.

14 6. Overzealous defendants' economic sanctions prohibited plaintiff to
15 work, they lose sanity and place the plaintiff under siege if he earns any income or
16 have positive standing in society. In 2003, defendant FBI denied employment to
17 plaintiff to accommodate criminals' wishes and demands. Traitor defendants in
18 many occasions, including in November 5, and 12, of 2011, stole new tech ideas
19 from the plaintiff's home, and sold them to entities dislike United States; again, in
20 various occasions, including in March 22, 2013, and April 5, 2013 defendants stole
21 real estate business information contacts from the plaintiff's home, sold them to
22 real estate professionals. Defendants and criminals made a pact to bankrupt and
23 force the plaintiff deed his house to criminals, then split proceed from the sale of
24 house among themselves. The plaintiff extremely concern for his safety from
25 defendants. In the case Varona Pacheco Co. Vs. Federal Bureau of Investigation
26 D.C. Puerto Rico 1978. Honorary Court supported with plaintiff's request, and
27 ordered the defendant to release the documents.

28 //////////////

COMPLAINT

7. Bribed defendants formed a criminal "Alliance" with barbaric: John Adem, Robert Adem, Edward Adam, Fehmi Tasci, Ergun Goral, Greg Lucett, and many others; defendants falsely classify those individuals victims, hard working honest Holly Christians, originally from Aristocratic Royal families, helping the government, law abiding citizen with good family and high moral values, victims of religious persecution, humanitarian, they immigrated into United States with millions of dollars; for those reasons, they are exempt from all the laws in the United States, and entitled to commit crimes, terrorize, dominate, crucify, control and force the plaintiff commit crimes with them. Corrupt defendants are hired guns for those people; defendants would terrorize and assassinate anyone to accommodate their wishes. In the past, in Middle-East, those people's families falsely accused minority Christians spies for Western Countries until force them move to other countries then took over their homes and businesses. Liar defendants commit crimes with those people and informants, they wasted over \$26 Million taxpayers' money and acted upon outside their jurisdiction and violated Title 42 U.S.C.A. Section 2000e-5(f) covered-up and helped those individuals avoid prosecution.

8. In many occasions including in 2010 and 2011 Edward Adam, Fehmi Tasci, Ergun Goral stated "We have friends working in the government and police we told our partners employed within federal government to follow, punish, isolate, put you under house arrest, disrupt your life, conduct experiment on you, cause you health problems, prevent you earn income and have family, for criticizing us. We are the law, we are punishing you and will hurt you further for complaining against us and exposing us to the government, you are at our mercy" They also claimed "Our friends in the government don't like United States, the Education Department, Presidents Obama and Bush. In 2012, plaintiff prepared to file false claim and defamation lawsuit against ruthless: John Adem, Edward Adam, Robert Adem, Fehmi Tasci, Ergun Goral, Greg Lucett, and others, defendants threatened, suppressed, and discouraged attorneys to represent the plaintiff. Then, laugh about it.

1 9. Traitor defendants brainwashed, created fear mongering, discouraged
2 any female associate with the plaintiff, they claim plaintiff is a beast and will taint
3 Caucasian race if he associates with women, to force plaintiff marry within his
4 relatives or through fraudulent marriage to help other families immigrate into
5 United States. Overzealous defendants constantly laugh, celebrate and proudly
6 claim they prevented penniless, loser, life failure plaintiff to have own children of a
7 family. On January 14, 2011, plaintiff's informed Department of Homeland Security
8 about a group of criminals arranging fraudulent documents to immigrate wrong
9 people into United States. Defendants prevented DHS investigate plaintiff's complain.

10 10. Defendant Los Angeles (LA) County Sheriff Department harassed,
11 slandered, falsely accused the plaintiff with criminal acts and negative allegation,
12 to create hostility against him. On October 20, 2011, around 7:50pm a LA County
13 Sheriff Department deputy fallowed the plaintiff, then falsely accused him of drinking
14 and few weeks before, Sheriff Deputy asked the plaintiff if using drugs. On August 28
15 2012, around 1:30pm LA County Sheriff Department's helicopter circulated at very
16 low altitude over plaintiff's house to connect plaintiff to a fire in the area, and in
17 many other incidents defendant LA County Sheriff Department harassed, slandered
18 demonized the plaintiff. On September 7, 2012, plaintiff contacted the Internal
19 Affair Bureau of LA County Sheriff Department regarding harassment and concern
20 for his safety from LA county CV Sheriff Station, plaintiff was referred to watch
21 commander of CV Sheriff station, on all those incidents defendant LA County CV
22 Sheriff Department did not care and gave vague verbal responses.

23 11. Defendant Glendale Police Department (GPD) harassed, slandered
24 and threatened the plaintiff. GPD circulated helicopter over plaintiff's home. On
25 March 19, 2009, on September 25, 2009, on August 31, 2011, on September 26,
26 2011, on March 8, 2012, and various other times plaintiff made public records
27 request from GPD about helicopters circulating over plaintiff's house, GPD gave
28 limited data, then laugh about it. Copies of those requests are Exhibit-B

12. Defendants operating outside their jurisdiction, and will influence the Honorary Court with false allegation to ignore plaintiff and side with defendants they will use all government resources, waste taxpayers' funds to suppress this case, prevent truth and other crimes to surface. Statements made by defendants and others without the plaintiff's present and knowledge must be recorded false and fabricated, the Honorary Court must not allow and make decision based on false premises made by defendants and others, which will betray the judicial system, and protect criminals from prosecution. Many people disagree with defendants' criminal misconducts, and crimes against United States. The documents plaintiff requesting will prove the real perpetrators, various employees within defendants are engage in criminal misconduct and commit crimes with John Adem, Robert Adem, Edward Adam, Fehmi Tasci, Ergun Goral, Greg Lucett, and many others. In the case American Civil Liberty Union Vs. U.S. DOJ D.D.C. 2004. Honorary Court decided plaintiff's request was within the law, and ordered the defendant to release the documents.

13. Plaintiff, Abraham John Pusa, respectfully requesting from the Honorary Court under Freedom of Information Act, Title 5 U.S.C §552, and Title 5, §552 (a)(4)(B) to order the defendants release all written, verbal, electronic surveillance records, or all other documents and communications pertaining to plaintiff. The FOIA exempt and immunity should not be extended to defendants at this time. Defendants' illegal surveillance operations intended to protect criminals from prosecution, and do not benefit the defendants or United States. Defendants acted outside their jurisdiction wasted in excess of \$26Million taxpayers' money, falsely accused the plaintiff, retaliated, covered-up, to benefit criminals, and diverting liability from criminals to defendants. Defendants engage in witch-hunt desperately framing the plaintiff with false accusations, to divert attention from real crimes, and protect criminals from prosecution. Plaintiff must be given the opportunity of Due Process in the Honorary Court to obtain those documents to clear his damaged name under Freedom of Information Act, Title 5 U.S.C §552, and Title 5, §552 (a)(4)(B).

COMPLAINT


Defendants have acknowledged by law can release all communications at the order of the Honorary Court. In the case, Bartlett vs. U.S DOJ, FBI E.D. Pa. 1994. Honorary Court agreed with plaintiff's request, and ordered defendant to release the documents.

WHEREFORE, plaintiff Abraham John Pusa prays for judgment against the defendants and request from the Honorary Court as follows:

- (1) Order the defendants to provide access to the requested documents;
- (2) Expedite this proceeding as provided for in 28 U.S.C. Section 1657;
- (3) Award plaintiff costs and reasonable attorneys fees in this action, as provided in 5 U.S.C. Section 522 (a)(4)(E); and
- (4) Grant such other and further relief as it may deem just and proper.
- (5) Order overzealous defendants to stop spreading outrages lies that caused the plaintiff health problems, loss of income, prevented him to have family
- (6) Order defendants to abandon vicious plans of denying medical care to the plaintiff, to accommodate criminals' wishes and demands.
- (7) Order defendants to abandon vicious plans to force the plaintiff form negative opinion of the government to accommodate criminals' wishes and demands.
- (8) Order the defendants to stop sabotaging plaintiff's intention to file defamation lawsuit against criminals to clear his damaged name, work, and merge with the society.
- (9) Order the defendants disclose to whom have been given and sold all the new technology ideas, and real estate business contacts and information took from plaintiff's house valued at \$8,647,000.00, and return the leftover.
- (10) Order defendants to disclose all classified information defendants' employees stole from United States government, and sold to other countries.

Dated: June 24, 2013

Respectfully submitted


By Abraham John Pusa
Plaintiff in Pro Per

COMPLAINT

CERTIFICATE OF SERVICE

For timeline purposes, it shall be presumed that the parties received the foregoing within five days. I certify on June 24, 2013, the foregoing, COMPLAINT FOR INJUNCTIVE RELIEF, AND FALSE CLAIM ACT, in The Complain For Injunctive Relief, Civil Case _____ ABRAHAM JOHN PUSA Vs. Federal Bureau of Investigation, United States Attorney Office, Los Angeles County Sheriff Department, and Glendale Police Department was send via mail to the appropriate representative.

UNITED STATES ATTORNEY OFFICE
312 N. SPRING St. 12th Floor.
LOS ANGELES, CA. 90012


FEDERAL BUREAU of INVESTIGATION,
11000 WILSHIRE BLVD. Suite 1700
LOS ANGELES, CA. 90024

LOS ANGELES COUNTY SHERIFF DEPT.
4700 RAMONA BLVD.
MONTEREY PARK, CA. 91754

CITY OF GLENDALE
OFFICE OF THE CITY ATTORNEY
613 E. BROADWAY #200
GLENDALE, CA. 91206

Dated: June 24, 2013

Respectfully submitted



Abraham John Pusa
Plaintiff pro se



U. S. Department of Justice

***United States Attorney
Central District of California***

*United States Courthouse
312 North Spring Street
Los Angeles, California 90012*

August 24, 2012

Mr. Abraham Pusa
2955 Montrose Avenue
La Crescenta, CA 91214

Re: Citizen Complaint

Dear Mr. Pusa:

This will acknowledge receipt of your letter/complaint received August 20, 2012.

The United States Attorney's Office does not conduct criminal investigations. Federal investigative agencies have the authority to review allegations made by citizens and conduct appropriate investigations. Since, you reported this situation to the appropriate agencies, including the Federal Bureau of Investigation, this office will not take any further action.

We hope the foregoing clarifies the position of this office.

Sincerely,

A handwritten signature, possibly "Q", written in black ink.

Citizen Complaint Section

Exhibit-A



CITY OF GLENDALE REQUEST FOR PUBLIC RECORDS

I wish to review _____ obtain copies 1 of the following public records:

- 1: ALL communications and records pertaining me
within GPD, including all active investigations, and false
allegations made against me by following persons, John Adem,
Robert Adem, Edward Adam, Fehmi Tasci, Ergun Goral, Greg Lucett,
and others.
- 2: I am highly concern the Glendale Police
Department will harm me.

NAME: Abraham John Pusa

ADDRESS: 2955 Montrose Ave. La Crescenta, CA 91214

TELEPHONE NUMBER: (818) 441-8881

Dated this 19th of March, 2009

Requests for City documents must be made to the City Clerk. There is a \$.10 per page charge for copies of most public Documents.

Disposition of Request

_____ Documents Reviewed Immediately _____ Locating Responsive Documents

_____ Copies Provided _____ Respond By _____

CITY ATTORNEY'S OFFICE
2009 MAR 19 PM 3:33

Hours of Operation:
Monday Thru Thursday 7:30 a.m. – 5:30 p.m., Friday 8:00 a.m. – 5:00 p.m.
CITY CLERK'S OFFICE
613 E. Broadway Ave., RM 110, Glendale, CA 91206-4393
(818) 548-2090

Exhibit-B



CITY CLERK

2011 AUG 31 AM 10: 02

**CITY OF GLENDALE
REQUEST FOR PUBLIC RECORDS**

I wish to review _____ obtain copies X of the following public records:

1: On August 29, 2011, between 8:20pm to 8:30pm, a GPD helicopter circulated over my house near the intersection of Montrose Ave. & Ramsdell Ave. in La Crescenta. I would like to know, why GPD helicopter again was circulating over and near to my house. Please provide accurate data.

2: _____

JOHN PUSA

NAME: _____ JOHN PUSA

ADDRESS: _____ 2955 MONTROSE AVE. LA CRESCENTA, CA. 91214

TELEPHONE NUMBER: _____ 818-441-8888

Dated this _____ 31 _____ of _____ AUGUST _____, 20 11

Requests for City documents must be made to the City Clerk. There is a \$.10 per page charge for copies of most public Documents.

Disposition of Request

_____ Documents Reviewed Immediately _____ Locating Responsive Documents

_____ Copies Provided _____ Respond By _____

Hours of Operation:
Monday Thru Thursday 7:30 a.m. – 5:30 p.m., Friday 8:00 a.m. – 5:00 p.m.
CITY CLERK'S OFFICE
613 E. Broadway Ave., RM 110, Glendale, CA 91206-4393
(818) 548-2090

(Rev. 3/2004)

Exhibit-B



CITY CLERK

2011 SEP 26 AM 11:07

CITY OF GLENDALE REQUEST FOR PUBLIC RECORDS

I wish to review _____ obtain copies x of the following public records:

1: On September 24, 2011, approximately at 7:00 PM two GPD helicopters circulated dangerously over my residence at 2955 Montrose Ave, La Crescenta. I would like to know why two GPD helicopters circulated over my house. Please provide accurate data.

2: I am seeking all documents related to GPD helicopter operators' alcohol consumption and use of any drugs while on duty. Please provide accurate data.

JOHN PUSA

NAME: JOHN PUSA

ADDRESS: 2955 MONTROSE AVE. LA CRESCENTA, CA. 91214

TELEPHONE NUMBER: 818-441-8881

Dated this 26th of SEPTEMBER, 2011

Requests for City documents must be made to the City Clerk. There is a \$.10 per page charge for copies of most public Documents.

Disposition of Request

_____ Documents Reviewed Immediately _____ Locating Responsive Documents

_____ Copies Provided _____ Respond By _____

Hours of Operation:
Monday Thru Thursday 7:30 a.m. – 5:30 p.m., Friday 8:00 a.m. – 5:00 p.m.

CITY CLERK'S OFFICE
613 E. Broadway Ave., RM 110, Glendale, CA 91206-4393
(818) 548-2090

(Rev. 3/2004)

Exhibit-B



And Counter
CITY CLERK

CITY OF GLENDALE 2012 MAR -8 AM 7:56
REQUEST FOR PUBLIC RECORDS

I wish to review _____ obtain copies X of the following public records:

1: On March 7, 2012, approximately at 5:45pm a GPD helicopter followed me after I left my house on Montrose Ave, to Pennsylvania Ave. then to Foothill Blvd. and back to Montrose Ave. I am seeking all available information and documents, why the dangerous GPD helicopter followed me during that particular time. Please do not apply prejudice and double standard as always some GPD's officers treat me.

2: _____

JOHN PUSA

NAME: _____ JOHN PUSA

ADDRESS: _____ 2955 MONTROSE AVE. LA CRESCENTA, CA. 91214

TELEPHONE NUMBER: _____ 818-441-8881

Dated this _____ MARCH _____ of _____ 8 _____, 20 12

Requests for City documents must be made to the City Clerk. There is a \$.10 per page charge for copies of most public Documents.

Disposition of Request

_____ Documents Reviewed Immediately _____ Locating Responsive Documents

_____ Copies Provided _____ Respond By _____

Hours of Operation:
Monday Thru Thursday 7:30 a.m. – 5:30 p.m., Friday 8:00 a.m. – 5:00 p.m.
CITY CLERK'S OFFICE
613 E. Broadway Ave., RM 110, Glendale, CA 91206-4393
(818) 548-2090

(Rev. 3/2004)

Exhibit-B

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

NOTICE OF ASSIGNMENT TO UNITED STATES MAGISTRATE JUDGE FOR DISCOVERY

This case has been assigned to District Judge Beverly Reid O'Connell and the assigned discovery Magistrate Judge is Paul Abrams.

The case number on all documents filed with the Court should read as follows:

CV13- 4658 BRO (PLAx)

Pursuant to General Order 05-07 of the United States District Court for the Central District of California, the Magistrate Judge has been designated to hear discovery related motions.

All discovery related motions should be noticed on the calendar of the Magistrate Judge

=====

NOTICE TO COUNSEL

A copy of this notice must be served with the summons and complaint on all defendants (if a removal action is filed, a copy of this notice must be served on all plaintiffs).

Subsequent documents must be filed at the following location:

☒ **Western Division**
312 N. Spring St., Rm. G-8
Los Angeles, CA 90012

☐ **Southern Division**
411 West Fourth St., Rm. 1-053
Santa Ana, CA 92701-4516

☐ **Eastern Division**
3470 Twelfth St., Rm. 134
Riverside, CA 92501

Failure to file at the proper location will result in your documents being returned to you.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEETI (a) PLAINTIFFS (Check box if you are representing yourself ☒)

Abraham John Pusa

DEFENDANTS

Federal Bureau of Investigation, LA office
United States Attorney Los Angeles office
Los Angeles County Sheriff, CV station
Glendale Police Department

(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.)

Abraham John Pusa
2955 Montrose Ave.
La Crescenta, CA 91214

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an X in one box only.)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question (U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant ☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only
(Place an X in one box for plaintiff and one for defendant.)

- | | PTF | DEF | | PTF | DEF |
|---|---------------------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State | <input checked="" type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business in this State | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business in Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

IV. ORIGIN (Place an X in one box only.)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from another district (specify): ☐ 6 Multi-District Litigation ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☐ Yes ☒ No (Check 'Yes' only if demanded in complaint.)CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No

MONEY DEMANDED IN COMPLAINT: \$

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Complaint For Injunctive relief

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES	CONTRACT	TORTS	TORTS	PRISONER PETITIONS	LABOR
<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input checked="" type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General Habeas Corpus <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE/PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSD Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609

FOR OFFICE USE ONLY: Case Number:

CV13-04658

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEETVIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☐ No ☒ Yes
If yes, list case number(s): CV 06-00195-MMM-CWVIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☐ No ☒ Yes
If yes, list case number(s): CV 06-00195-MMM-CW

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply)
- ☒
- A. Arise from the same or closely related transactions, happenings, or events; or
-
- ☒
- B. Call for determination of the same or substantially related or similar questions of law and fact; or
-
- ☐
- C. For other reasons would entail substantial duplication of labor if heard by different judges; or
-
- ☐
- D. Involve the same patent, trademark or copyright,
- and
- one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
-
- ☐
- Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
-
- ☐
- Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
-
- Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Los Angeles	

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): A. Dusa Date June 24, 2013

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))